## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

In re: NEURONTIN MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION

MDL Docket No. 1629

Master File No. 04-10981

THIS DOCUMENT RELATES TO:

Judge Patti B. Saris

HARDEN MANUFACTURING CORPORATION; LOUISIANA HEALTH SERVICE INDEMNITY COMPANY, d/b/a BLUE CROSS/BLUE SHIELD OF LOUISIANA; ASEA/AFSCME LOCAL 52 HEALTH BENEFITS TRUST; JAN FRANK WITYK; and GARY VARNAM, on behalf of themselves and all others similarly situated, Mag. Judge Leo T. Sorokin

Plaintiffs,

v.

PFIZER INC. and WARNER-LAMBERT COMPANY,
Defendants.

## MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Harden Manufacturing Corporation; Louisiana Health Service Indemnity

Company, d/b/a Blue Cross/Blue Shield Of Louisiana; ASEA/AFSCME Local 52

Health Benefits Trust pursuant to Fed. R. Civ. P. 23 request this Court to grant final approval of the proposed \$325 million class action settlement which the Plaintiffs originally submitted to the Court on May 30, 2014, (Dkt. No. 4259) and which the Court gave its preliminary approval on July 25, 2014 (Dkt. No. 4277).

In support for this motion the Plaintiffs file the following:

1. Memorandum of Law In Support of Motion for Final Approval of Proposed Class Action Settlement;

2. Declaration of Elizabeth Levine Re: Mailing and Publication of Notice to Class;

3. Declaration of Thomas M. Sobol in Support of Class Plaintiffs' Motion for Final

Approval of Settlement;

4. Declaration of Thomas M. Greene in Support of Class Plaintiff Counsel's Motion

for an Award of Attorney's Fees; and

5. Affidavit of Arthur R. Miller Concerning the Reasonableness of Counsel for the

Class Plaintiffs' Request for an Award of Attorneys' Fees and Expenses.

Class Plaintiffs have previously submitted a [Proposed] Final Order and

Judgment Granting Final Approval of the Class Action Settlement Agreement and

Release, Approving Proposed Allocation of Settlement Funds, and Approving Class

Counsel's Application for Attorneys' Fees, Reimbursement of Litigation Expenses and

Compensation for Class Representatives (Dkt. No. 4260-3).

Dated: September 15, 2014

Respectfully Submitted,

By:

/s/ Thomas M. Greene

Thomas M. Greene

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Members of the Class Plaintiffs' Steering Committee

## **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system has been served on September 15, 2014.

/s/ Thomas M. Greene
Thomas M. Greene

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